

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**CONCORD MANAGEMENT AND  
CONSULTING LLC,**

**Defendant.**

**Crim. No. 18-CR-32-2 (DLF)**

**GOVERNMENT’S NOTICE OF TESTIMONY**

The United States of America, by and through undersigned counsel, hereby provides written notice of its intent to introduce testimony regarding the Internet Protocol (“IP”) addresses used to access certain social media accounts related to this case.

**I. Factual Background**

Count One of the Superseding Indictment charges defendant Concord Management and Consulting LLC and its co-conspirators with conspiracy to defraud the United States by interfering with the lawful government functions of the Federal Election Commission (“FEC”), the Justice Department Foreign Agents Registration Act Unit (“DOJ FARA Unit”), and the State Department. The Superseding Indictment alleges that, as part of this interference activity, the conspirators “operated social media pages and groups designed to attract U.S. audiences.” Doc. 247 ¶ 3. The Superseding Indictment further alleges that these social media pages and groups “falsely claimed to be controlled by U.S. activists when, in fact, they were controlled by the Defendants.” *Id.* The Superseding Indictment describes in detail the conspirators’ use of social media platforms such as Facebook and Instagram. *Id.* ¶¶ 32-38. The Superseding Indictment alleges that the conspirators used those social media platforms to purchase political

advertisements, *id.* ¶¶ 48-50, and to organize and coordinate political rallies in the United States, *id.* ¶¶ 51-57. The Superseding Indictment further alleges that, in order to hide their Russian identities, the conspirators used computer servers inside the United States to set up virtual private networks, which allowed them to access online social media accounts “while masking the Russian origin and control of the activity.” *Id.* ¶ 39. This use of virtual private networks to conceal their Russian identities was one of the means by which the conspirators interfered with the lawful government functions of the FEC and the DOJ FARA Unit.

## **II. Description of the Witness’s Testimony**

The witness, FBI Analyst Elizabeth Patrone, will testify about the conspirators’ use of computer infrastructure. Ms. Patrone will testify that records produced by social media companies related to the social media accounts used by the conspirators show the Internet Protocol (“IP”) addresses used to access those accounts. (In the case of individual social media accounts, the records show the IP address used by the account holder to access the account. In the case of Facebook group accounts, the records show the IP address used by the account creator or administrator to access the account.) Ms. Patrone will testify that, in some instances, the IP address used to access the social media account was operated by a company called Green Floid. Records produced to the government by Green Floid show that these IP addresses were used as virtual private servers, which means that these IP addresses were accessed from elsewhere and routed through Green Floid’s servers. The IP addresses used to access the relevant social media accounts were assigned to individuals accessing Green Floid’s servers from IP addresses in Russia associated with the Internet Research Agency and Concord Management and Consulting. Those same Russian IP addresses were also used by members of the conspiracy to access their personal email accounts.

### **III. Bases for Witness's Testimony**

Ms. Patrone will base her testimony on her analysis of the records provided by the social media companies, by Green Floid, and by the Internet service providers (including Google) who hosted the personal email accounts of the conspirators.

### **IV. The Witness's Qualifications**

Ms. Patrone's qualifications are summarized in her resume, which will be provided to the defense under separate cover. Her qualifications include her experience as an analyst with the FBI.

Respectfully submitted,

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